

1 IN THE DRAWINGS

2 Fig. 2 is amended to include 'modem' 112.

3

REMARKS

These remarks follow the order of the paragraphs of the office action. Relevant portions of the office action are shown indented and italicized.

Claims 1-37 remain in the application. Claims 1, 29, 31, and 36 are amended herein.

DETAILED ACTION

[Office Action's] Response to Amendment This is in response to amendment filed on 2/10/05 in which claims 1-37 are pending.

Claim Rejections - 35 USC § 112

The following is a quotation of the second paragraph of 35 U.S.C. 112: The specification shall conclude with one or more claims particularly pointing out and distinctly claiming the subject matter which the applicant regards as his invention.

Claim 31 recites the limitation "a client device" in line 15. Applicant needs to specify if this is the same client device as in line 11 or a second client device.

In response applicant respectfully states that claims 31 and 36 are amended to change recurrence of 'a client device' to 'the client device', after the first time in claim 31. This overcomes the 35 USC 112 rejection.

Drawings

The drawings are objected to under 37 CFR 1.83(a). The drawings must show every feature of the invention specified in the claims. Therefore, the "telephone modem" must be shown or the feature(s) canceled from the claim(s). No new matter should be entered. Corrected drawing sheets in compliance with 37 CFR 1.121(d) are required in reply to the Office action to avoid abandonment of the application. Any amended replacement drawing sheet should include all of the figures appearing on the immediate prior version of the sheet, even if only one figure is being amended. The figure or figure number of an amended drawing should not be labeled as "amended." If a

1 drawing figure is to be canceled, the appropriate figure must be
2 removed from the replacement sheet, and where necessary, the
3 remaining figures must be renumbered and appropriate changes
4 made to the brief description of the several views of the
5 drawings for consistency. Additional replacement sheets may be
6 necessary to show the renumbering of the remaining figures. Each
7 drawing sheet submitted after the filing date of an application
8 must be labeled in the top margin as either "Replacement Sheet"
9 or "New Sheet" pursuant to 37 CFR 1.121 (d). If the changes are
10 not accepted by the examiner, the applicant will be notified
11 and informed of any required corrective action in the next
12 Office action. The objection to the drawings will not be
13 held in abeyance.

14 In response applicant respectfully states that Fig. 2 is amended
15 to show 'modem 112'. A complete set of drawings are included
16 herewith. This overcomes the drawing objection under 37 CFR
17 1.83(a)

18 **[Office Action's] Response to Arguments**

19 Applicant's arguments filed have been fully considered but
20 they are not persuasive. Therefore, this case is made
21 final.

22 As per claim 31, Applicant asserts that a client device
23 could dial-in directly to a remote dial-up server attached to
24 the home distribution network and the PSTN. However, Valencia
25 clearly teaches a Network Access Server for receiving and
26 processing data transmitted from the remote client (See col. 4,
27 lines 15-21). Applicant is reminded that during patent
28 examination, the claims are given the broadest reasonable
29 interpretation. Applicant is interpreting the claims very narrow
30 without considering the broad teaching of the references used in
31 the rejection. It should be noted that the examiner is
32 entitled to the broadest reasonable interpretation of the claims.

33 In response applicant respectfully states that a difference
34 between Valencia and the current invention is beyond just the use
35 of Network Access Server. Valencia specifically teaches
36 "...establishing a second communication link between the ISP and
37 the local area network..." (claim 1, column 15 lines 16-19; claim).
38 An examination of the figures, the text, and claim 1 of Valencia
39 one can easily notice that this two step process of connecting to

1 two different devices is always present, e.g., Figure 3 shows a
2 connection to a NAS and then a connection to the home gateway.
3 Furthermore, these two necessary devices are located apart and
4 are connected with each other via the Internet services provided
5 by an ISP. This is not what is claimed in claim 31. Claim 31
6 claims the use of a single apparatus via which a user in which a
7 user client device can establish communication in one step (and
8 not by connecting to two devices in two steps as Valencia
9 teaches) with the dial-up server (and successively to the
10 services accessible via the home network).

11 Claim 31 directly indicates that "said apparatus being a single
12 apparatus through which a user with the user client device can
13 establish communication in one step." Claim 31 is also amended
14 to indicate that, "said user connecting means employing only one
15 of a cellular voice network and a PSTN." Thus claim 31 is
16 allowable over the cited art

17 *As per claims 1 and 29, Applicant argues that Sharma's invention*
18 *centers around a reactive system and network manager procedure,*
19 *where first and error condition is detected and then the network*
20 *manage takes actions to remedy this condition. However, Applicant*
21 *failed to present argument showing were the Office reference*
22 *does not meet the claimed language. The applicant is reminded*
23 *of the clear difference between reading the claims in light of*
24 *the specification and reading the limitations of the*
25 *specification into the claims. Applicant cannot rely on the*
26 *specification to impart to the claims limitations not recited*
27 *therein.*

28 In response applicant respectfully states that the Applicant in
29 response to the first office action, considered the entire
30 paragraph [0019] on page 2 in Sharma's invention. However,
31 apparently the Examiner extracted only portions of that paragraph
32 that put together read as follows: "A system ... that enables a
33 network manager ... to remotely manage network through mobile
34 wireless capable devices." Applicant still believes though that
35 the argument made was proper when the entire paragraph [0019]

1 were to be considered. However, if only the specific portions of
2 this paragraph were to be considered, the Applicant now realizes
3 the point that the Office action is raising. Thus consideration
4 of the complete paragraph shows that Sharma does not teach the
5 invention of claim 31.

6 However, in the response to point (5.a) in the Office Action, the
7 office action also mentions the teachings of Sawada as well. The
8 Applicant still believes that Sawada's teachings do not cover the
9 Applicant's invention as further argued next and therefore,
10 together with the amended claims 1 and 29, the Applicant still
11 respectfully disagrees with the point (5.a) that the Office
12 action raises.

13 Claims 1 and 29 are further amended to indicate that it includes,
14 "employing only one of a cellular voice network and a PSTN."
15 Thus amended claims 1 and 29 are allowable over the cited art.

16 *Furthermore, Applicant argues that the list that the present*
17 *invention claimed are lists for accessing services and not*
18 *devices as Sawada teaches. This is not persuasive since the*
19 *user is accessing the devices for the only purpose of*
20 *accessing the services. Applicant is interpreting the*
21 *claims very narrow without considering the broad teaching of the*
22 *references used in the rejection. It should be noted that the*
23 *examiner is entitled to the broadest reasonable interpretation*
24 *of the claims.*

25 In response applicant respectfully states that while recognizing
26 that one accesses a device for the only purpose to access the
27 service that this device provides, the Applicant respectfully
28 disagrees with the examiner that this is identical to accessing a
29 service directly without first accessing a device. There is no
30 reason to assume that there exists a one-to-one correspondence
31 between a service and a device. While devices provide services, a
32 single service can be implemented across multiple devices. For
33 example, a "home theater service" may be implemented by

manipulating the lighting control, A/C control, audio control, TV control, lowering the projection screen control, and so on, devices. Some day, this service may even interact over the Internet with on-line video-on-demand servers and libraries to select the movie to watch through the home theater service - in other words, the location, type, ownership, and so on, of the devices supporting the service becomes immaterial. A preferred embodiment of this service will hide from the user all these elemental components of the service. It will not expose to him/her the devices that support the service but it would simple expose to him a menu/list of option specific to the home theater service itself. For this reason, the Applicant believes that providing access to a device is a fundamentally different concept to accessing a service. Sawada's invention deals exclusive with devices and how these devices are able to expose their control interfaces to terminal devices external of the home network. There exists no concept of services that can be "composed" across multiple devices and controlled remotely in any of Sawada's claims. Therefore the Applicant argues that the teachings of Sawada about accessing devices do not cover (even for the skilled in the art) the ramifications of accessing services instead.

Claim Rejections - 35 USC § 102

2. The following is a quotation of the appropriate paragraphs of 35 U.S.C. 102 that form the basis for the rejections under this section made in this Office action:

A person shall be entitled to a patent unless -- (e) the invention was described in (1) an application for patent, published under section 122(b), by another tiled in the United States before the invention by the applicant for patent or (2) a patent granted on an application for patent by another filed in the United States before the invention by the applicant for patent, except that an international application filed under the treaty defined in section 351(a) shall have the effects for purposes of this subsection of an application filed in the United States only if the international application designated the United States and was published under Article 21 (2) of such treaty in the English language.

3. Claims 31, 36-37 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,308,213 to Valencia.

a. As per claim 31, Valencia teaches an apparatus attaches on a home network for a user using a client device attached to a wireless, circuit-switched, voice telephony network, to interact with at least one service on said home network, said apparatus comprising: a telephone modem to directly receive an incoming call from a client device, and also to receive and transmit data over a telephone network, said telephone modem having a client port through which the apparatus attaches to the telephone network (See col. 3, lines 44-47 and col. 4, lines 14-38) (The remote client is coupled to the ISP that accesses the Internet infrastructure via a PSTN ... The network access server NAS includes a modem for receiving and processing data transmitted from the remote client) ; a dial-in service module to implement dial-in logic for the client device; a browser server module for managing data for remote display; ; and a protocol transport module to implement protocols needed to transport data back and forth between a browser application in the client device and a browser server module (See col. 3, lines 60-67 and col. 4, lines 1-14) (the remote client accesses the Local Area Network through the dial-up session. .. and the remote client can access any of the resources on the LAN ... the dial-up session uses a L2F protocol to project a point-to-point link level session).

aaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaawwwwwwwwww

b. As per claim 36, Valencia teaches the claimed invention as described above. Furthermore, Valencia teaches wherein said dial-in server module triggers at least one particular module in the apparatus to process any incoming calls and requests from a client device (See col. 2, lines 10-19).

In response, applicants respectfully state that the cited reference (col. 2, ln. 10-19) describes the fact that the client device after it connects to the home gateway, it can be managed through databases controlled by the local network (i.e., a control path direction from the home network to the client, which is opposite to what claim 36 of our invention implies).

Furthermore, the cited reference states that the client device gains access to resources. There is no reference to what these resources are and we contend that someone skilled in the art would not find in the cited reference that "...said dial-in server module triggers at least one particular module in the apparatus..." Thus claim 36 is allowable over the cited art.

1 c. As per claim 37, Valencia teaches the claimed invention
2 as described above. Furthermore, Valencia teaches wherein
3 said dial-in server module performs user authentication (See
4 col. 2, lines 34-45)

5 In response, applicants respectfully state this is a dependent
6 claim that depends on claim 31. The cited art does not perform
7 user authentication for the elements of claim 31. Thus claim 37
8 is allowable over the cited art.

9 zzzzzzzzzzzzFurthermore, applicants respectfully state that the
10 cited reference to Sharma does not make any of the claims in the
11 present application obvious. Applicants do not concur with the
12 obviousness stated. The Office action may not employ elements or
13 parts of elements in cited references in alleging obviousness.
14 Furthermore, applicants list particular reasons below why each
15 claim is not obvious over the cited art. Thus Claims 1-3, 5-8,
16 10, 12, 15-22,24,27-30 are allowable over the cited art.

17 Sharma (paragraph [0019]) furthermore states "...Once an error
18 condition is detected on a network, the system enables a network
19 manager..." Therefore, Sharma's invention centers around a
20 reactive system and network manager procedure, where first an
21 error condition is detected and then the network manager takes
22 actions to remedy this condition --the following paragraph
23 ([0020]) further underscores this aspect of Sharma's invention by
24 stating "...The present invention provides methods and systems to
25 propagate fault and real-time monitoring capability from a
26 network management server to remote mobile wireless capable
27 devices..." This reactive operation fundamentally distinguishes
28 our invention from that of Sharma's.

29 Although, Sawada may indeed teach use of a type of list. However,
30 Sawada's invention is directed to controlling network devices
31 using a wide-area computer network such as the Internet (col. 1,
32 ln. 30-32), which is not what the invention cited in office

1 action. Sawada's invention apparently teaches about controlling
2 network devices, which, in particular, make use of the IEEE 1394
3 serial bus for communication (col. 4, ln. 5-8). Contrary,
4 invention claimed in office action0., is directed to controlling
5 services independently from devices (if any) that are involved in
6 support of these services or the communication protocols are
7 used for communicating to the implementors (being software
8 modules or networked devices) of these services. Therefore the
9 lists that the present invention claimed in office action0 refer
10 to are lists for accessing services and not devices as Sawada
11 teaches.

12 As a result, applicants do not share the office action's view
13 that that it would have been obvious to one with ordinary skill
14 in the art at the time the invention was made to incorporate the
15 use of lists as taught by Sawada, in the claimed invention of
16 Sharma in order to make remotely control home network devices
17 available using wide-area network such as the Internet. This is
18 because a person with ordinary skills will not have been able to
19 create services and access and control these services and obtain
20 the results of the elements of claims 1-3, 5-8, 10, 12,
21 15-22,24,27-30 without the present invention, just starting from
22 lists that control IEEE 1394-compliant devices.

23 Furthermore, claim 1, underscores this aspect of our invention.
24 Claim 1 is amended to be directed to , "a home data distribution
25 network, said home data distribution network comprising an
26 aggregation of at least one communications media and at least one
27 communications protocol used to access said at least one remote
28 service from a serving entity," and having a limitation,
29 "selecting said at least one communications media and at least
30 one communications protocol that said selected at least one
31 service uses." The additional clarifications in this claim is

1 described in col. 2, paragraph 20 of the present invention
2 09/933,625 (US Patent Application US2003/0041119 A1). This
3 paragraph describes that the home distribution network comprises
4 an aggregation of at least one communications and communications
5 protocols, and therefore to access a service attached to the home
6 network the step of selecting at least one communications media
7 and at least one communications protocol has to occur. This
8 aggregation of networks and protocols and as a consequence the
9 step of selecting at least one is not taught by either Sharma nor
10 Sawadan. Thus claim 31 is allowable over the cited art. Claims
11 32-37, which depend on claim 21 thereon are allowable in
12 themselves and because each ultimately depends on an allowable
13 claim.

14 Likewise, claim 29 includes, "second connecting means for
15 attaching said apparatus to a communications medium and using a
16 communications protocols, taken from an aggregation of
17 communication media and protocols, through which said at least
18 one remote service can be accessed;" and "second selecting means
19 for selecting the communications medium and protocol to access
20 said selected at least one service." Furthermore claim 29 is
21 amended herein. Thus claim 29 is allowable.

22 *b. As per claim 2, Sharma the claimed invention as described*
23 *above. Furthermore, Sharma teaches wherein the client device*
24 *is portable (See page 3, paragraph [0037]). c. As per claim*
25 *3, Sharma teaches the claimed invention as described above.*
26 *Furthermore, Sharma teaches wherein the client device is a*
27 *cellular telephone (See page 3, paragraph [0037]).*

28 *d. As per claim 5, Sharma teaches the claimed invention as*
29 *described above. Furthermore, Sharma teaches wherein the*
30 *viewing is performed employing a viewing device collocated*
31 *with said client device (See page 3, paragraph [0037]).*

32 *e. As per claim 6, Sharma teaches the claimed invention as*
33 *described above, Furthermore, Sharma teaches wherein the*
34 *viewing device depicts information. in a form including at*

1 least one of text, graphics, images, light display, or any
2 combination of these (See page 3, paragraph [0037]) (Remark:
3 It is inherent that the mobile device depicts information in
4 at least one or more these forms in order to manage the
5 network assets).

6 In response, applicants respectfully state claims 2, 5 and 6 are
7 dependent claims that depends on allowable claim 1, and are
8 therefore allowable. Furthermore, it is not inherent that a
9 mobile device will depict information in at least one or more of
10 these forms as in these claims - which are indeed not about
11 managing network assets as Sharma teaches. For example, the use
12 of LEDs as light displays for is not necessarily an inherent
13 feature of a network management mobile device. Examiner is
14 requested to provide backup for this so-called inherentcy.

15 Furthermore claim 6 is amended to include voice, to better
16 protect the invention.

17 As per claim 7, Sharma teaches the claimed invention as
18 described above. However, Sharma fails to teach wherein the
19 step of selecting includes employing a menu.

20 Sawada teaches wherein the step of selecting includes
21 employing a menu (See col. 2, lines 1-2).

22 It would have been obvious to one with ordinary skill in the
23 art at the time the invention was made to incorporate
24 wherein the step of selecting includes employing a menu as
25 taught by Sawada in the claimed invention of Sharma in order
26 to allow the user to exercise concentrated control over the
27 home network devices trough the homepage list and remotely
28 control the home network devices via the homepage (See col.
29 2, lines 3-6).

30 g. As per claim 8, Sharma teaches the claimed invention as
31 described above. However, Sharma teaches wherein the step of
32 viewing is performed employing a web- browser and the
33 serving entity is a web-server.

34 Sawada teaches wherein the step of viewing is performed
35 employing a web- browser and the serving entity is a

1 web-server (See col. 2, lines 45-52 and col. 4, lines
2 35-41).

3 It would have been obvious to one with ordinary skill in the
4 art at the time the invention was made to incorporate the
5 step of viewing is performed employing a web- browser and
6 the serving entity is a web-server as taught by Sawada in
7 the claimed invention of Sharma in order to allow the user
8 to exercise concentrated control over the home network
9 devices trough the homepage list and remotely control the
10 home network devices via the homepage (See col. 2, lines
11 3-6).

12 h. As per claim 10, Sharma teaches the claimed invention as
13 described above. Furthermore, Sharma teaches wherein the
14 data network is the Intranet controlled by an Internet
15 Service Provider (See page 14, paragraph [0153]).

16 In response, applicants respectfully state claims 7, 8, and 10
17 are dependent claims that depends on allowable claim 1, and are
18 therefore allowable. Furthermore, the cited reference (Sharma,
19 paragraph [0153] on page 14) gives a collection of network
20 examples, however, none of them states that the network is an
21 Intranet controlled by an ISP.

22 i. As per claim 12, Sharma teaches the claimed invention as
23 described above. Furthermore, Sharma teaches serving entity
24 employing attributes of said circuit switch network in
25 authenticating said user (See page 7, paragraph [0061]).

26 j. As per claim 15, Sharma teaches the claimed invention as
27 described above. Furthermore, Sharma teaches establishing
28 credentials so that said at least one remote service can be
29 manipulated in a secure manner on the serving entity (See
30 page 3-4, paragraph [0092]).

31 In response, applicants respectfully state claim 12 is a
32 dependent claim that depends on allowable claim 1, and is
33 therefore allowable. Furthermore, the cited reference (Sharma,
34 paragraph [0092] on pages 3-4), refers to the use of ACLs
35 organized in a hierarchy database and provide access privileges
36 and permissions to network assets. Our claim focuses on
37 manipulating a remote service in a secure manner. Access control

1 defines who is authorized of accessing a resource and it does not
2 necessarily imply that a resource can be manipulated and
3 particularly in a secure manner, which may involve encryption of
4 communication to and from the manipulated asset.

5 *k. As per claim 16, Sharma teaches the claimed invention as*
6 *described above. -*

7 *Furthermore, Sharma teaches wherein the step of viewing*
8 *views the list on a viewing device in a manner that depends*
9 *on the user's access privileges to said at least one remote*
10 *service (See pages 3- 4, paragraph [0092]).*

11 *l. As per claim 17, Sharma teaches the claimed invention as*
12 *described above. Furthermore, Sharma teaches the serving*
13 *entity providing access to at least one service agent used*
14 *to access and control said at least one remote service.*

15 In response, applicants respectfully state claims 16 and 17 are
16 dependent claims that depends on allowable claim 1, and are
17 therefore allowable. Furthermore, the applicants contend that
18 Sharma apparently does not teach the use of service agents for
19 accessing and controlling the said remote services. It may teach
20 a network management system that has a connection path to a
21 network asset but not of providing access to a service agent to
22 access and control the network asset.

23 *m. As per claim 18, Sharma in view of Sawada teaches the*
24 *claimed invention as described above. Furthermore, Sharma*
25 *teaches wherein at least one of said at least one service*
26 *agent is a computer software module executable on a computer*
27 *(See page 6, paragraph [0052]).*

28 In response, applicants respectfully state claim 12 is a
29 dependent claim that depends on allowable claim 1, and is
30 therefore allowable. Furthermore, the applicants contend that
31 Sharma in view of Sawada does not teach the use of service agents
32 that are software modules that are executed on a computer. In
33 particular, the cited reference (Sharma paragraph [0052] on page
34 6) teaches about use of a PAN to connect to a network asset and

1 provide network management capability over the PAN, however, it
2 does not apparently teach the use of a service agent of any kind.

3 *n. As per claim 19, Sharma in view of Sawada teaches the*
4 *claimed invention as described above. Furthermore, Sharma*
5 *teaches activating said software module prior to invoking a*
6 *particular remote service (See page 6, paragraph [0052]).*

7 In response, applicants respectfully state claim 12 is a
8 dependent claim that depends on allowable claim 1, and is
9 therefore allowable. Furthermore, the applicants contend that
10 Sharma in view of Sawada does not teach the use of service agents
11 that are software modules that are executed on a computer. In
12 particular, the cited reference (Sharma paragraph [0052] on page
13 6) teaches of about the use of a PAN to connect to a network
14 asset and provide network management capability over the PAN,
15 however, it does not teach the use of a service agent of any
16 kind.

17 *o. As per claim 20, Sharma in view of Sawada teaches the*
18 *claimed invention as described above. Furthermore, Sharma*
19 *teaches activating said software module on demand after a*
20 *particular remote service has been invoked (See page 6,*
21 *paragraph [0054]). .*

22 In response, applicants respectfully state that claim 20 is a
23 dependent claim that depends on claim 18 and ultimately on claim
24 1 and is therefore allowable. Furthermore, the applicants contend
25 that Sharma in view of Sawada does not teach the use of service
26 agents that are software modules that are executed on a computer.
27 In particular, the cited reference (Sharma paragraph [0054] on
28 page 6) teaches of a PAN network configuration for accessing
29 network assets, however, it does not teach activating said
30 software module on demand after a particular remote service has
31 been invoked. Claim 20 is also therefore allowable.

32 *p. As per claim 21, Sharma in view of Sawada teaches the*
33 *claimed invention as -*

1 described above. Furthermore, Sharma teaches storing said
2 software module at a data repository (See page 8, paragraph
3 [0068]).

4 In response, applicants respectfully state that claim 21 is a
5 dependent claim that depends on claim 18 and ultimately on claim
6 1 and is therefore allowable. Furthermore, the applicants contend
7 that Sharma in view of Sawada does not teach that [service agent]
8 software modules are stored in a data repository. In particular,
9 the cited reference (Sharma paragraph [0068] on page 8) teaches a
10 distributed fault propagation and notification system, however,
11 it does not teach storing said software module at a data
12 repository.

13 q. As per claim 22, Sharma in view of Sawada teaches the
14 claimed invention as described above. Furthermore, Sharma
15 teaches dynamically retrieving and activating said software
16 module from the data repository after invoking a particular
17 remote service (See page 6, paragraph [0054-0055]).

18 In response, applicants respectfully state that claim 20 is a
19 dependent claim that depends on claim 18 and ultimately on claim
20 1 and is therefore allowable. Furthermore, the applicants contend
21 that Sharma in view of Sawada does not teach dynamically
22 retrieving and activating said [service agent] software module
23 from the data repository after invoking a particular remote
24 service. In particular, the cited reference (Sharma paragraph
25 [0054-0055] on pages 6 and 7) refers to different network
26 management topologies, however, it does not teach dynamically
27 retrieving and activating said [service agent] software module
28 from the data repository after invoking a particular remote
29 service.

30 r. As per claim 24, Sharma et al in view of Sawada teaches
31 the claimed invention as described above. Furthermore,
32 Sharma fails to teach wherein said wireless, circuit-
33 switched, voice telephony network is a second generation,
34 digital, cellular network (See page 3, paragraph [0037]).

1 In response, applicants respectfully state claim 24 is a
2 dependent claim that depends on allowable claim 1, and is
3 therefore allowable. Furthermore, the applicants agree with the
4 examiner's statement "...Sharma fails to teach...", showing the
5 examiner appears to be in agreement with the applicants regarding
6 this claim. Thus this claim is apparently not rejected.

7 *s. As per claim 27, Sharma teaches the claimed invention as*
8 *described above. Furthermore, Sharma teaches an article of*
9 *manufacture comprising a computer usable medium having*
10 *computer readable program code means embodied therein for*
11 *causing a user to interact with at least one remote service,*
12 *the computer readable program code means in said article of*
13 *manufacture comprising computer readable program code means*
14 *for causing a computer to effect the steps of claim 1 (See*
15 *page 3, paragraph [0052- 0054]).*

16 In response, applicants respectfully state claim 27 is a
17 dependent claim that depends on allowable claim 1, and is
18 therefore allowable. Furthermore, the applicants do not fully
19 understand the examiner's statement "... (See page 3, paragraph
20 [0052-0054])." as these paragraphs are not on page 3 and they
21 refer to different network management topologies that are
22 applicable to Sharma's invention and not about an article of
23 manufacture.

24 *t. As per claim 28, Sharma et al teaches the claimed*
25 *invention as described above. -*
26 *Furthermore, Sharma et al teaches a program storage device*
27 *readable by machine, tangibly embodying a program of*
28 *instructions executable by the machine to perform method*
29 *steps for causing a user to interact with at least one*
30 *remote service, said method steps comprising the steps of*
31 *claim 1 (See page 3, paragraph [0052-0054]).*

32 In response, applicants respectfully state claim 28 is a
33 dependent claim that depends on allowable claim 1, and is
34 therefore allowable. Furthermore, the applicants do not fully
35 understand the examiner's statement "... (See page 3, paragraph
36 [0052-0054])." as these paragraphs are not on page 3 and they

1 refer to different network management topologies that are
2 applicable to Sharma's invention and not about a program storage
3 device.

4 v. As per claim 30, Sharma et al in view of Sawada teaches
5 the claimed invention as described. Furthermore, Sharma et
6 al teaches a computer program product comprising a computer
7 usable medium having computer readable program code means
8 embodied therein for causing a user to interact with at
9 least one remote service, the computer readable program code
10 means in said computer program product comprising computer
11 readable program code means for causing a computer to effect
12 the functions of claim 28 (See page 3, paragraph
13 [0052-0054]).

14 In response, applicants respectfully state claim 30 is a
15 dependent claim that ultimately depends on allowable claim 1, and
16 is therefore allowable. Furthermore, the applicants do not fully
17 understand the examiner's statement "... (See page 3, paragraph
18 [0052-0054])." as these paragraphs are not on page 3 and they
19 refer to different network management topologies that are
20 applicable to Sharma's invention and not about a computer usable
21 program.

22 6. Claims 4, 9, 11, 13-14, 23 and 25- 26 are rejected under 35
23 U.S.C. 103(a) as being unpatentable over U.S. Patent
24 Application No. 2002/0068559 to Sharma et al in view of U.S.
25 Patent No. 6,735,619 to Sawada as applied to claim 1 above,
26 and further in view of U.S. Patent No. 6,308,213 to
27 Valencia.

28 a. As per claim 4, Sharma et al in view of Sawada teaches
29 the claimed invention as described above. However, Sharma et
30 al in view of Sawada fails to teach wherein the step of
31 connecting includes dialing-up directly to the serving
32 entity.

33 Valencia teaches a wherein the step of connecting includes
34 dialing-up directly to the serving entity (See col. 2, lines
35 5-10).

36 It would have been obvious to one with ordinary skill in the
37 art at the time the invention was made to incorporate
38 wherein the step of connecting includes dialing-up directly

1 to the serving entity as taught by Valencia in the claimed
2 invention of Sharma et al in view of Sawada in order to
3 access a private local network through an internet access
4 service (See col. 1, lines 11-12).

5 In response, applicants respectfully state claims 4, 9, 11,
6 13-14, 23 and 25- 26 are dependent claims that depends on
7 allowable claim 1, and are therefore allowable. Furthermore, the
8 cited reference to Valencia (col. 2, ln. 5-10) teaches about a
9 direct dial-up between the NAS and the home gateway and not a
10 direct dial-up between the user and his client device and the
11 serving entity. The presence of the NAS in between the remote
12 client and the home gateway is an aspect of Valencia's invention
13 that results from the necessary existence of an ISP between the
14 client device and the home gateway. As discussed in our response
15 to 3.a above, the presence of ISP is not a required aspect of our
16 invention.

17 b. As per claim 9, Sharma et al in view of Sawada teaches
18 the claimed invention as described above. However, Sharma et
19 al in view of Sawada fails to teach wherein the step of
20 connecting includes dialing-up to the serving entity through
21 a data network to which the serving entity is connected.

22 Valencia teaches wherein the step of connecting includes
23 dialing-up to the serving entity through a data network to
24 which the serving entity is connected (See col. 2, lines
25 11-19).

26 It would have been obvious to one with ordinary skill in the
27 art at the time the invention was made to incorporate
28 wherein the step of connecting includes dialing-up to the
29 serving entity through a data network to which the serving
30 entity is connected as taught by Valencia in the claimed
31 invention of Sharma et al in view of Sawada in order to
32 access a private local network through an internet access
33 service (See col. 1, lines 11-12).

34 In response, applicants respectfully state claim 9 is a dependent
35 claim that depends on allowable claim 1, and is therefore
36 allowable. Furthermore, the cited reference to Valencia (col. 2,
37 ln. 11-19) teaches about the use of the L2F and PPP protocols and

1 that the client device could be managed by databases eventually
2 creating the illusion of a direct dial-up connection (although
3 not a real, physical dial-up connection). These aspects of
4 Valencia's invention are not applicable to our invention that
5 does not requires the use of any databases to manage the client
6 device.

7 *c. As per claim 11, Sharma et al in view of Sawada teaches*
8 *the claimed invention as described above. Furthermore,*
9 *Sharma et al teaches wherein the data network uses the*
10 *TCP/IP protocol suite for transporting information (See page*
11 *9, paragraph [0076]).*

12 In response, applicants respectfully state claim 11 is a
13 dependent claim that depends on allowable claim 1, and is
14 therefore allowable. Furthermore, the cited reference to Sharma
15 (paragraph [0076] on page 9) teaches (or to be more precise,
16 implies) about the use of Internet protocols on the network
17 between the NMS and the network assets and not the network
18 between the client device and the serving entity (or the NMS in
19 Sharma's case).

20 *d. As per claim 13, Sharma et al in view of Sawada teaches*
21 *the claimed invention as described above. However, Sharma et*
22 *al in view of Sawada fails to teach wherein said attributes*
23 *include a telephone number of said client device.*

24 *Valencia teaches wherein said attributes include a telephone*
25 *number of said client device (See col. 4, lines 15-23).*

26 *It would have been obvious to one with ordinary skill in the*
27 *art at the time the invention was made to incorporate*
28 *wherein said attributes include a telephone number of said*
29 *client device as taught by Valencia in the claimed invention*
30 *of Sharma et al in view of Sawada in order to access a*
31 *private local network trough an internet access service (See*
32 *col. 1, lines 11-12).*

33 In response, applicants respectfully state claim 13 is a
34 dependent claim that depends on allowable claim 1, and is
35 therefore allowable. Furthermore, the cited reference to Valencia

1 (col. 4, ln. 15-23) teaches of a direct dial-up connection
2 between the client device and the NAS and the use of the LCP
3 packets of the PPP protocol to test this data link. This
4 reference does not teach using a telephone number of a client
5 device as a means of authenticating a user directly by the
6 serving entity.

7 *e. As per claim 14, Sharma et al in view of Sawada teaches*
8 *the claimed invention as described above. However, Sharma et*
9 *al in view of Sawada fails to teach wherein said attributes*
10 *include a telephone number of said serving entity.*

11 *Valencia teaches wherein said attributes include a telephone*
12 *number of said serving entity (See col. 4, lines 15-23).*

13 *It would have been obvious to one with ordinary skill in the*
14 *art at the time the invention was made to incorporate*
15 *wherein said attributes include a telephone number of said*
16 *serving entity as taught by Valencia in the claimed*
17 *invention of Sharma et al in view of Sawada in order to*
18 *access a private local network through an internet access*
19 *service (See col. 1, lines 11-12).*

20 In response, applicants respectfully state claim 14 is a
21 dependent claim that depends on allowable claim 1, and is
22 therefore allowable. Furthermore, the cited reference to Valencia
23 (col. 4, ln. 15-23) teaches of a direct dial-up connection
24 between the client device and the NAS and the use of the LCP
25 packets of the PPP protocol to test this data link. This
26 reference does not teach using a telephone number of a serving
27 entity as a means of authenticating a user directly by the
28 serving entity.

29 *f. As per claim 23, Sharma et al teaches the claimed*
30 *invention as described above. However, Sharma fails to teach*
31 *wherein said wireless, circuit-switched, voice telephony*
32 *network is a first generation, analog, cellular network.*

33 *Valencia teaches wherein said wireless, circuit-switched,*
34 *voice telephony network is a first generation, analog,*
35 *cellular network (See col. 3, lines 44-47).*

1 It would have been obvious to one with ordinary skill in the
2 art at the time the invention was made to incorporate
3 wherein said wireless, circuit-switched, voice telephony
4 network is a first generation, analog, cellular network as
5 taught by Valencia in the claimed invention of Sharma et al
6 in view of Sawada in order to access a private local network
7 through an internet access service (See col. 1, lines 11-12).

8 In response, applicants respectfully state claim 23 is a
9 dependent claim that depends on allowable claim 1, and is
10 therefore allowable. Furthermore, the cited reference to Valencia
11 (col. 3, ln. 44-47) teaches of a client device coupled to the NAS
12 of an ISP that accesses the Internet infrastructure using the
13 PSTN. However, the cited reference to Valencia does not teach
14 about the use of a first generation analog, cellular network --
15 this network is an entirely distinct network to Valencia's PSTN.

16 g. As per claim 25, Sharma et al teaches the claimed
17 invention as described above. However, Sharma et al in view
18 of Sawada fails to teach wherein the step of dialing-up
19 directly to the service entity further includes passing
20 dialing signaling and control data to the serving entity
21 through an intermediary data network.

22 Valencia teaches wherein the step of dialing-up directly to
23 the service entity further includes passing dialing
24 signaling and control data to the serving entity through an
25 intermediary data network (See col. 3, lines 44-54).

26 It would have been obvious to one with ordinary skill in the
27 art at the time the invention was made to incorporate
28 wherein the step of dialing-up directly to the service
29 entity further includes passing dialing signaling and
30 control data to the serving entity through an intermediary
31 data network as taught by Valencia in the claimed invention
32 of Sharma et al in view of Sawada in order to access a
33 private local network through an internet access service (See
34 col. 1, lines 11-12).

35 In response, applicants respectfully state claim 25 is a
36 dependent claim that depends on allowable claim 1, and is

1 therefore allowable. Furthermore, applicants dispute the
2 obviousness based on non-related art.

3 *h. As per claim 26, Sharma et al teaches the claimed*
4 *invention as described above. However, Sharma et al in view*
5 *of Sawada fails to teach wherein the step of dialing-up.to*
6 *the serving entity through a data network, further includes*
7 *dialing-up to the serving entity through a sequence of at*
8 *least one data network, the last one of which the serving*
9 *entity is attached to.*

10 *Valencia teaches wherein the step of dialing-up to the*
11 *serving entity through a data network, further includes*
12 *dialing-up to the serving entity through a sequence of at*
13 *least one data network, the last one of which the serving*
14 *entity is attached to (See col. 3, lines 60-67 and col. 4,*
15 *lines 1-14).*

16 *It would have been obvious to one with ordinary skill in the*
17 *art at the time the invention was made to incorporate*
18 *wherein the step of dialing-up to the serving entity through*
19 *a data network, further includes dialing-up to the serving*
20 *entity through a sequence of at least one data network, the*
21 *last one of which the serving entity is. attached to as*
22 *taught by Sharma et al in the claimed invention of Valencia*
23 *in order to access a private local network trough an*
24 *internet access service (See col. 1, lines 11-12).*

25 In response, applicants respectfully state claim 26 is a
26 dependent claim that depends on an allowable claim, and is
27 therefore allowable. Furthermore, the cited reference to Valencia
28 (col. 3, ln. 60-67 and col. 4, ln. 1-14) fails, we contend, to
29 teach or make obvious the use of multiple data networks between
30 the client device and the serving entity, as our invention does
31 (paragraph [0025] on page 3).

32 *7. Claims 32-35 are rejected under 35 U.S.C. 103(a) as being*
33 *unpatentable over U.S. Patent No. 6,308,213 to Valencia in*
34 *view of US. Patent No. 6,735,619 to Sawada.*

35 *a. As per claim 32, Valencia teaches the claimed invention*
36 *as described above. However, Valencia fails to teach wherein*
37 *said browser server is used to obtain, organize, and*

1 manipulate data received from and data sent to the client
2 device through the protocol transport module.

3 Sawada teaches wherein said browser server is used to
4 obtain, organize, and manipulate data received from and data
5 sent to the client device through the protocol transport
6 module (See col. 2, lines 44-52).

7 It would have been obvious to one with ordinary skill in the
8 art at the time the invention to incorporate wherein said
9 browser server is used to obtain, organize, and manipulate
10 data received from and data sent to the client device
11 through the protocol transport module in order to make it
12 easy to control home network devices (See col. 2, lines
13 60-63).

14 In response, applicants respectfully state claim 32 is a
15 dependent claim that depends on an allowable claim, and is
16 therefore allowable. Furthermore, the cited reference to Sawada
17 (col. 2, ln. 44-52) teaches using an apparatus with a WWW browser
18 (our invention does not require the use of a WWW browser) to
19 instruct the home network gateway apparatus to send control
20 information to a home network device to execute an operation. The
21 cited reference does teach using a browser server to obtain,
22 organize, and manipulate data received from and data sent to the
23 client device through the protocol transport module.

24 b. As per claim 33, Valencia teaches the claimed invention
25 as described above. However, Valencia fails to teach wherein
26 said data sent to the client device are displayed and viewed
27 by the browser application in the client device.

28 Sawada teaches fails to teach wherein said data sent to the
29 client device are displayed and viewed by the browser
30 application in the client device (See col. 1, lines 39- 42).

31 It would have been obvious to one with ordinary skill in the
32 art at the time the invention was made to incorporate fails
33 to teach wherein said data sent to the client -
34 device are displayed and viewed by the browser application
35 in the client device as taught by Sawada in the claimed
36 invention of Valencia in order to make it easy to control
37 home network devices (See col. 2, lines 60-63).

1 In response, applicants respectfully state claim 33 is a
2 dependent claim that depends on an allowable claim, and is
3 therefore allowable. Furthermore, the applicants agree with the
4 examiner's statement "...Sawada teaches fails to teach...", and
5 dispute the obviousness.

6 *c. As per claim 34, Valencia teaches the claimed invention*
7 *as described above. However, Valencia fails to teach wherein*
8 *said data sent includes a list of services that are*
9 *accessible by the client device.*

10 *Sawada teaches wherein said data sent includes a list of*
11 *services that are accessible by the client device (See col.*
12 *1, lines 39-42)*

13 *It would have been obvious to one with ordinary skill in the*
14 *art at the time the invention was made to incorporate*
15 *wherein said data sent includes a list of services that are*
16 *accessible by the client device as taught by Sawada in the*
17 *claimed invention of Valencia in order to make it easy to*
18 *control home network devices (See col. 2, lines 60- 63).*

19 In response, applicants respectfully state claim 34 is a
20 dependent claim that depends on an allowable claim, and is
21 therefore allowable. Furthermore, the cited reference to Sawada
22 (col. 1, ln. 39-42) teaches displaying a list of home network
23 devices on the display of the client device. However, displaying
24 a device does not imply that a service (which is what our
25 invention focuses on instead of simply devices) is accessible by
26 the device. Displaying the existence of, for example, an
27 air-conditioning service in a house, does not mean that one can
28 also access the service and change its operation. This is what
29 our invention means by accessing, and this is not taught, we
30 believe, by the cited reference to Sawada.

31 *d. As per claim 35, Valencia teaches the claimed invention*
32 *as described above. However, Valencia fails to teach wherein*
33 *said data received by the browser application in the client*
34 *device include a selection of at least one service the user*
35 *of the client device controls and an action to be taken for*
36 *a selected service, and upon receipt of the action the*

1 browser server interacts with a particular service agent to
2 implement the control logic for controlling the selected
3 service, wherein a control signal generated by the service
4 agent exits the apparatus through the client port.

5 Sawada teaches wherein said data received by the browser
6 application in the client device include a selection of at
7 least one service the user of the client device controls and
8 an action to be taken for a selected service, and upon
9 receipt of the action the browser server interacts with a
10 particular service agent to implement the control logic for
11 controlling the selected service, wherein a control signal
12 generated by the service agent exits the apparatus through
13 the client port (See col. 2, lines 27-52).

14 It would have been obvious to one with ordinary skill in the
15 art at the time the invention was made to incorporate
16 wherein said data received by the browser application in the
17 client device include a selection of at least one service
18 the user of the client device controls and an action to be
19 taken for a selected service, and upon receipt of the action
20 the browser server interacts with a particular service
21 agent to implement the control logic for controlling the
22 selected service, wherein a control signal generated by the
23 service agent exits the apparatus through the client port as
24 taught by Sawada in the claimed invention of Valencia in
25 order to make remotely control home network devices
26 available using wide-area network such as the Internet (See
27 col. 1, lines 30-34).

28 In response, applicants respectfully state claim 35 is a
29 dependent claim that depends on an allowable claim, and is
30 therefore allowable. Furthermore, the cited reference to Sawada
31 (col. 2, ln. 27-52) fails to teach, we contend, the use of
32 service agents with which the browser server interacts to adjust
33 the behavior the service controlled by the service agent.

34 Claims 1-37 remain in the application. Claims 1, 29, 31, and 36
35 are amended herein. Thus these claims and all claims that depend
36 upon these claims are allowable over the cited art. Thus, claims
37 1-37 are allowable.

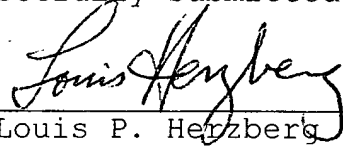
1 A listing of the claims is provided as required in the new USPTO
2 amendment practice per 37 CFR 1.121.

3 It is anticipated that this amendment brings the application to
4 allowance of all the claims. Favorable action is respectfully
5 solicited. In the unlikely event that any claim remains
6 rejected, please contact the undersigned by phone in order to
7 discuss the application.

8 Please charge any fee necessary to enter this paper to deposit
9 account 50-0510.

10 Respectfully submitted,

11 By:


12 Dr. Louis P. Herzberg
13 Reg. No. 41,500
14 Voice Tel. (845) 352-3194
15 Fax. (914) 945-3281

16 3 Cloverdale Lane
17 Monsey, NY 10952

18 Customer Number: 54856